

NICHOLAS VASSALLO
United States Attorney
JEREMY A. GROSS (WY Bar #7-5110)
Assistant United States Attorney
P.O. Box 668
Cheyenne, WY 82003-0668
Telephone: 307-772-2124
jeremy.gross@usdoj.gov

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

LESLEY FARBY
Assistant Branch Director

JEREMY S.B. NEWMAN
Trial Attorney
Civil Division, Federal Programs Branch
U.S. Department of Justice
1100 L St. NW
Washington, DC 20005
Phone: (202) 532-3114
jeremy.s.newman@usdoj.gov

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

Jake Stanley De Wilde, Individually and as)	
Trustee of the DEWILDE ARMS TRUST,)	
)	
Plaintiff,)	
)	Case No. 1:23-cv-00003-SWS
v.)	
)	
Attorney General of the United States;)	
Director of the Bureau of Alcohol,)	
Tobacco, Firearms, and Explosives,)	
)	
Defendants.)	
)	

DEFENDANTS' MOTION TO DISMISS THE COMPLAINT

Defendants Merrick Garland, in his official capacity as the Attorney General of the United States of America, and Steven Dettelbach, in his official capacity of the Bureau of Alcohol,

Tobacco, Firearms, and Explosives, through undersigned counsel, hereby move to dismiss the Complaint for Declaratory and Injunctive Relief (Doc. 1), for failure to state a claim, pursuant to Federal Rule of Civil Procedure 12(b)(6). The accompanying Memorandum in Support of Defendants' Motion to Dismiss the Complaint further states the grounds for this Motion.

Dated this 13th day of March, 2023.

Respectfully Submitted,

NICHOLAS VASSALLO
United States Attorney

By: /s/ Jeremy A. Gross

JEREMY A. GROSS
Assistant United States Attorney

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

LESLEY FARBY
Assistant Branch Director

JEREMY S.B. NEWMAN
Trial Attorney
Civil Division, Federal Programs Branch
U.S. Department of Justice
1100 L St. NW
Washington, DC 20005
Phone: (202) 532-3114
Email: jeremy.s.newman@usdoj.gov